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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 KERRI L. VAN HORN,

15 Plaintiff,

16 v.

17 ACCTCORP OF SOUTHERN NEVADA,
18 BANK OF AMERICA, N.A., FORD MOTOR
CREDIT COMPANY, LLC, OCWEN
19 LOAN SERVICING, LLC, CITIBANK, and
20 EXPERIAN INFORMATION SOLUTIONS,
INC.,

21 Defendants.
22

Case No.: 2:15-cv-02345-RFB-CWH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S
FIRST AMENDED COMPLAINT**

[FIRST REQUEST]

23 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Kerri L. Van
24 Horn, by and through her counsel of record, Kazerouni Law Group, APC, and Defendant Bank of
25 America, N.A. ("BANA"), by and through its counsel of record, the law firm of Greenberg Traurig,
26 LLP, that the deadline for BANA to file a response to Plaintiff's First Amended Complaint for
27 Damages Pursuant to the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq. [DOC 19] shall be
28 extended from January 25, 2016 to February 8, 2016.

1 This request is made in good faith at this time and is not made simply to delay the
2 proceedings. No previous request for an extension of time for this deadline has been made.

3 DATED this 26th day of January, 2016.

DATED this 26th day of January, 2016.

4 GREENBERG TRAURIG, LLP

KAZEROUNI LAW GROUP, APC

5 /s/ Whitney L. Welch, Esq.

/s/ Michael Kind, Esq.

6 By: _____

By: _____

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[PROPOSED] ORDER

Pursuant to the stipulation of the parties,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the Stipulation and Order to Extend Time to Respond to Plaintiff's First Amended Complaint is hereby **GRANTED**.

IT IS HEREBY FURTHER ORDERED that the deadline for Defendant Bank of America, N.A. to file a response to Plaintiff's First Amended Complaint for Damages Pursuant to the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq. [DOC 19] shall be extended from January 25, 2016 to February 8, 2016.

IT IS SO ORDERED this 26th day of January, 2016.


UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:

GREENBERG TRAURIG, LLP

/s/ Whitney L. Welch, Esq.

By: _____

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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on January 26, 2016, a copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT [FIRST REQUEST]** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's CM/ECF system, and parties may access this filing through the Courts' CM/ECF system.

DATED this 26th day of January, 2016.

/s/ Shayna Noyce

An employee of Greenberg Traurig, LLP

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